

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

OPHELIA FETTER,	:	
	:	
Plaintiff	:	Civil Action No. 4:05-CV-00462
	:	
vs.	:	JURY TRIAL DEMANDED
	:	
JERSEY SHORE AREA SCHOOL	:	The Honorable John E. Jones, III
DISTRICT,	:	
	:	<i>(Electronically Filed)</i>
Defendant.	:	

**PROPOSED SPECIAL VERDICT QUESTION ON DAMAGES BY  
UNITED NATIONAL SPECIALTY INSURANCE COMPANY**

United National Specialty Insurance Company (f/k/a Hallmark Insurance Company) (“United National”) hereby submits its proposed Special Verdict Question pursuant to this Court’s June 12, 2006 and July 6, 2006 Orders:

**UNITED NATIONAL’S PROPOSED INTERROGATORY**

United National proposes that the jury be provided with the following special interrogatory<sup>1</sup>:

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<sup>1</sup> This interrogatory would be subject to revision to reflect the actual elements of damage that go to the jury.

1. If you believe that damages should be awarded to the Plaintiff, please state the specific monetary amount being awarded for:

Lost wages from January 22, 2001 through the present \$\_\_\_\_\_.

Lost retirement credit \$\_\_\_\_\_.

Out of pocket medical expenses \$\_\_\_\_\_.

Out of pocket health insurance premiums \$\_\_\_\_\_.

Emotional distress \$\_\_\_\_\_.

Punitive damages \$\_\_\_\_\_.

Attorneys fees and costs \$\_\_\_\_\_.

Prejudgment interest \$\_\_\_\_\_.

Dated: July 31, 2006

Respectfully submitted,

**WHITE AND WILLIAMS LLP**

By: /s/ Gale White  
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*Attorneys for United National  
Specialty Insurance Company*

**CERTIFICATE OF SERVICE**

I, Ira S. Bergman, Esquire, hereby certify that I have caused a true and correct copy of the foregoing Proposed Special Verdict Question on Damages by United National Specialty Insurance Company to be served via electronic means pursuant to Local Rule 5.7 on July 31, 2006 upon the following:

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/s/ Ira S. Bergman  
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